



Christopher T. Ulmer
Senior Vice President

July 10, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington D.C. 20554

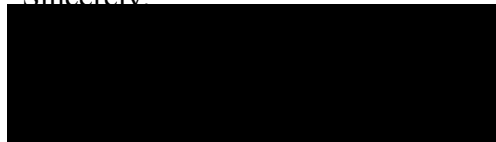
Re: *Connect America Fund*, WC Docket No. 10-90; 2018 FCC Form 481

Dear Ms. Dortch:

ICORE Consulting, on behalf of Ronan Telephone Company ("the Company") hereby submits to the Commission a copy of the Company's completed Form 481¹. Certain portions of the Form 481 filing include information that is confidential in nature. Specifically, the section entitled "Rate of Return Carrier Additional Information"² should be accorded confidential treatment. Attached please find a statement of the reasons for withholding the redacted materials from public inspection pursuant to 47 CFR § 0.459.

Thank you for your attention to this matter. Should you or any member of the Commission Staff have any questions or comments, please do not hesitate to contact us at your convenience.

Sincerely,



Senior Vice President

¹ This filing is required to comply with 47 CFR §§ 54.313 and 54.422(c).

² The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company ("USAC") website as "Section 3005" in the downloadable version and as "Section 3000" in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form filled out employs the 3005 or 3000 designation.

ICORE Consulting, LLC
326 South 2nd Street
Emmaus, PA 18049

Phone: (610) 928-3944
Fax: (610) 928-5036
www.icorellc.com

**CONFIDENTIALITY REQUEST AND STATEMENT OF JUSTIFICATION
IN COMPLIANCE WITH 47 C.F.R. §0459(b)**

Ronan Telephone Company (“Company”) is a small, privately held rural local exchange company based in Montana. The Company requests confidential treatment of certain information being provided to the Commission in its 2018 FCC Form 481. The information is competitively sensitive and its disclosure would have a negative competitive consequence upon the Company were it made publicly available. Such information would not ordinarily be made available to the public and should be afforded confidential treatment under 47 CFR §0.459.

Regulation	Statement of support and compliance with Confidentiality requests
47 CFR §0.459(a)(2)	ICORE Consulting, on behalf of the Company has e-filed, through ECFS, the redacted version and sent via USPS Express Mail the confidential hard copy version (original and one copy) of its 2018 FCC Form 481.
47 CFR §0.459(b)(1)	The Company requests that the documentation required in the section entitled “Rate of Return Carrier Additional Information ³ , which consists of the Company’s financial reports, income statement, balance sheet and cash flow statement, be accorded confidential treatment. The confidential information has been redacted from the public version with black shading.
47 CFR §0.459(b)(2)	The circumstances giving rise to the submission of this confidential information is set forth in 47 CFR § 54.313 and 47 CFR § 54.422.
47 CFR §0.459(b)(3) and §0.459(b)(4)	The information for which confidentiality is sought is financial in nature, including balance sheet, income statement, and statement of cash flows.
47 CFR §0.459(b)(5)	There is robust competition in the telecommunications market today, including wireless, VoIP providers, and cable television providers to name a few. Financial data such as the amount of cash on hand, amount of debt, and revenue by source are all examples of information that competitors would not receive in the normal course of business.
47 CFR §0.459(b)(6)	The financial information is disclosed only within the Company, and furthermore is only provided (1) members of senior management, or (2) those employees who require this information to perform their jobs.
47 CFR §0.459(b)(7)	The Company has not previously released this information to third parties without the execution of a non-disclosure agreement.
47 CFR §0.459(b)(8)	The Company requests that the information be held by the Commission as confidential indefinitely.

³ The financial reports section of FCC Form 481 is identified at the Universal Service Administrative Company (“USAC”) website as “Section 3005” in the downloadable version and as “Section 3000” in the online filing version at the same USAC website. <http://www.usac.org/hc/tools/forms.aspx>. The same identical financial information is required in both. The request for confidentiality applies regardless of whether the form filed out employs the 3005 or 3000 designation.

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name: Person USAC should contact with questions about this data	Christopher Ulmer
<035>	Contact Telephone Number: Number of the person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	culmer@icorellc.com
	Form Type	54.313 and 54.422

REDACTED - FOR PUBLIC INSPECTION

<010> Study Area Code 482252

<015> Study Area Name RONAN TEL CO

<020> Program Year 2019

<030> Contact Name - Person USAC should contact regarding this data Christopher Ulmer

<035> Contact Telephone Number - Number of person identified in data line
<030> 6109283903 ext.

<039> Contact Email Address - Email Address of person identified in data line
<030> culmer@icorellc.com

<400> Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.

<410> Complaints per 1000 customers for fixed voice

<420> Complaints per 1000 customers for mobile voice

(500) Compliance With Service Quality Standards and Consumer Protection Rules
Data Collection Form

FCC Form 481
OMB Control No. 3060-
July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

<515> Certify compliance with applicable minimum service standards

**(600) Functionality in Emergency Situations
Data Collection Form**

**FCC Form 481
OMB Control No. 3060-098
July 2018**

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	482252MT610.pdf

(800) Operating Companies
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com
<810>	Reporting Carrier	Ronan Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Ronan Telephone Company

[illegible]

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorelle.com

<900> Does the filing entity offer tribal land services? (Y/N) Yes

Flathead Indian Reservation

482252MT920.pdf

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(5) includes:

Select Yes or No or Not Applicable
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes
Yes

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

<1000> Voice services rate comparability certification

Yes

<1010> Attach detailed description for voice services rate comparability compliance

482252MT1010.pdf

Name of Attached Document

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1020> Broadband comparability certification

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

(1100) No Terrestrial Backhaul Reporting
Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

<1100>	Certify whether terrestrial backhaul options exist (Y/N)	Yes
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<1130>	Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).	
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<1140>	Alaska Plan rate-of-return certification (yes, no, or not applicable) of compliance with approved performance plan.	Not Applicable
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(1200) Terms and Condition for Lifeline Customers

Lifeline Data Collection Form

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

<1210>	Terms & Conditions of Voice Telephony Lifeline Plans	<div>482252MT1210.pdf</div> <div>Name of Attached Document</div>
<1220>	Link to Public Website	HTTP www.ronan.net

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221>	Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers,	<input checked="" type="checkbox"/>
<1222>	Details on the number of minutes provided as part of the plan,	<input checked="" type="checkbox"/>
<1223>	Additional charges for toll calls, and rates for each such plan.	<input checked="" type="checkbox"/>

(2005) Price Cap Carrier Additional Documentation		FCC Form 481	
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819	
Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers		July 2018	
<010>	Study Area Code	482252	
<015>	Study Area Name	RONAN TEL CO	
<020>	Program Year	2019	
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer	
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com	

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of frozen High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR 54.313(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

<2015>

2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016>

Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A>

Connect America Fund Phase II recipient?

<2017C>

Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2017.

Name of Attached Document Listing
Required Information

<2018>

Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

<2019>

Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

(3005) Rate Of Return Carrier Additional Documentation Data Collection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

CAF BLS Reporting

- (3008A) Please indicate whether new locations were deployed during the prior calendar year. (Yes/No)
- (3008B) Please enter the number of new locations deployed in the prior calendar year associated with each of the following speed tiers.
- (3008B1) Number of newly built locations with access to broadband speeds of at least 10/1 Mbps but less than 25/3 Mbps.
- (3008B2) Number of newly built locations with access to broadband speeds of 25/3 Mbps or higher.
- (3008C) Please provide the percentage of deployment across the entire study area.

<010>	Study Area Code	482252
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<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must also certify compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and the information attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)	Not Applicable - No Attachment Required	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)	<input type="checkbox"/>	
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers	<input type="checkbox"/>	
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows	<input type="checkbox"/>	
(3021)	Management letter and/or audit opinion issued by third party to certify compliance with the requirements of 47 CFR 54.313(f)(2)	<input type="checkbox"/>	

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2018

Data Collection Form

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035>	Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039>	Contact Email Address - Email Address of person identified in	er@icorellc.com

Financial Data Summary	
(3027) Revenue	
(3028) Operating Expenses	
(3029) Net Income	
(3030) Telephone Plant In Service(TPIS)	
(3031) Total Assets	
(3032) Total Debt	
(3033) Total Equity	
(3034) Dividends	

REDACTED - FOR PUBLIC INSPECTION

<010>	Study Area Code	482252
<015>	Study Area Name	RONAN TEL CO
<020>	Program Year	2019
<030>	Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
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<039>	Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations and provide a list of newly served community anchor institutions.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission's public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband meeting the requisite public interest obligations consistent with the category in which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates of comparable offerings in urban areas.

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document	Listing Required Information
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[illegible]

Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010> Study Area Code	482252
<015> Study Area Name	RONAN TEL CO
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035> Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2018
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<010> Study Area Code	482252
<015> Study Area Name	RONAN TEL CO
<020> Program Year	2019
<030> Contact Name - Person USAC should contact regarding this data	Christopher Ulmer
<035> Contact Telephone Number - Number of person identified in data line <030>	6109283903 ext.
<039> Contact Email Address - Email Address of person identified in data line <030>	culmer@icorellc.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>ICORE Consulting, LLC</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	ICORE Consulting, LLC
Name of Reporting Carrier:	RONAN TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 07/12/2018
Printed name of Authorized Officer:	Jay Preston
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	4066769218 ext.
Study Area Code of Reporting Carrier:	482252 Filing Due Date for this form: 07/16/2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	RONAN TEL CO
Name of Authorized Agent Firm:	ICORE Consulting, LLC
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 07/12/2018
Name of Authorized Agent Employee:	Christopher T. Ulmer
Title or position of Authorized Agent or Employee of Agent	Sr. VP
Telephone number of Authorized Agent or Employee of Agent:	6109283903 ext.
Study Area Code of Reporting Carrier:	482252 Filing Due Date for this form: 07/16/2018
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

As an initial point, the Company had no service outages during 2017 which met the FCC's threshold for reporting into the Network Outage Reporting System ("NORS").

The Company engages in preventative maintenance programs which help ensure network reliability in all conditions. This includes regular checks on generators, battery back-up, HVAC infrastructure at central office switches, and tree trimming/removal when trees have the potential to take down telephone lines during events of high wind or heavy snow. Access to critical infrastructure (like central office switches) is limited to essential personnel. Spare equipment is maintained in inventory.

Like most local exchange carriers, the Company's network consists of electronic switching equipment and a network of fiber optics and copper facilities. From a switching standpoint, the Company has one primary switch and smaller switches which are fed by the primary switch. These smaller switches are often referred to as intraexchange remote switches or concentrators. The largest threat to switches is the loss of power. To address this, the Company ensures adequate battery back-up is maintained. For emergency situations which extend beyond the useful life of the battery back-up, the Company uses generators to power the switches. These generators are portable which ensures they can be relocated to any switching center based on the specific needs of each switch. In addition, the Company's office will serve as a Command and Control center. This center is included as a primary location to which continuous power is required.

In cases of emergency, the Company's management has contact information for all employees. Depending upon the scope of the emergency, the Company may call-in as many employees as necessary to provide continual telecommunications service. The Company has access to local and regional construction companies which can be called in to supplement the work force if necessary. When poles are down from emergencies, the Company works with other utilities attached to the same poles to expedite the repair or replacement of the infrastructure.

In summation, the Company takes preventative measures to plan for emergency situations and also takes steps to mitigate the risk or duration of such events.

2017 RONAN TELEPHONE COMPANY TRIBAL ENGAGEMENT MEETING REPORT, FOR 2018 FCC FORM 481

MEETING HELD DECEMBER 14, 2017 WITH CONFEDERATED SALISH AND
KOOTENAI TRIBAL COUNCIL

Representatives of Ronan Telephone Company (RTC) went to the Confederated Salish and Kootenai Tribes (CS&KT) Tribal Council meeting on December 14, 2017, to meet with CS&KT Tribal Council members and to fulfill FCC Tribal Engagement requirements. Present were Council Members, Troy Felsman, Secretary, Leonard Gray, Ron Trahan, Patty Stevens, Dennis Clairmont, Carol Lankford, and Shelly Fyant. Company representatives: Jay Wilson Preston, Brandy Chisholm, and Laurence Walchuk. Greetings; then handed out survey to Council members present and requested their input and that they would send surveys out to other department heads. An explanation and discussion was held on new A-CAM Model USF funding from the FCC, which RTC will be receiving to improve Broadband speeds and availability and build out on the Reservation.

Council member Troy Felsman voiced concern about net neutrality.

Laurence Walchuk explained to Council that ILEC's are required by the FCC to have discussions with Tribal governments on five key areas, and to request comments and input.

1. A needs assessment and deployment planning with focus on anchor institutions. We informed Council of A-CAM funding and build-out of infrastructure, and told the Council that we have buried 40,960 feet of cable this summer and fall to shorten loops to customers and tribal members. We discussed future deployment plans for extending services to Tribal members on the Reservation.

2. Feasibility and sustainability planning. With A-CAM support and programs like Lifeline, Tribal members on the Reservation will continue to receive better service, and lower cost services in the future.

3. Marketing in a culturally and sensitive manner. We stated the customer service Representatives in our office are the best and they always listen to everyone, no matter who they are. We always make sure our Tribal subscribers are treated with respect and friendship. Laurence Walchuk stated that in this past year he knew of no time when cultural sensitivity was an issue.

4. Rights-of-way processes, land use permitting, facilities siting, environmental and cultural preservation review processes. To the extent needed for past construction RTC has collaborated

with rights-of-ways, land use permitting, and environmental and cultural departments of the Tribe. But with the new A-CAM funding and other positive outlooks in the communications business, RTC will be doing more new construction, and will be sure to stay in very close contact with rights-of-ways and other permitting departments on Tribal lands.

5. Compliance with Tribal business and licensing. RTC has not had a need or requirement to acquire or file for any new Tribal business licenses with the Tribe. We realize that we are guests doing business on the Reservation and would acquire any Tribal licenses if required to do so.

We thanked the Council for its time and the opportunity to meet with them. We also advised the Council to please let us know of any telecommunication issues or any other problems they may become aware of in the future.

A survey was also conducted in conjunction with this meeting, which was circulated to the Tribal Council and the Tribal departments. Feedback was requested on the five Tribal engagement subjects in the FCC rules. Very few negative comments were received in response to the survey, except there was a lot of interest expressed in service possibilities outside of the incumbent service territory (which is now predominately served by the RLEC Blackfoot Telephone Cooperative).

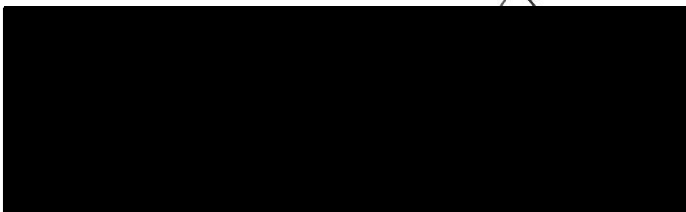


RONAN TELEPHONE COMPANY
312 MAIN STREET SOUTHWEST • RONAN, MONTANA 59864
(406) 676-2751 • FAX NO. (406) 676-8889

May 30, 2018

I, Jay W Preston hereby certify that Ronan Telephone Company
(OFFICER OF THE COMPANY) (NAME OF COMPANY)

pricing of voice services is no more than two standard deviations above the applicable national average urban rate for voice service as specified in the most recent public notice issued by the Wireline Commission Bureau.


Jay Preston
President

Ronan Telephone Company Lifeline Information

For those subscribers who qualify to be on Ronan's lifeline program they will receive only unlimited local calling through this program. The full rate is \$24/mo. with a discount of \$23/mo. Equaling \$1/mo. for dial tone.

If the lifeline subscriber selects long distance for his/her line then they will need to PIC an LD Carrier for this service. LD rates from this carrier would apply. Lifeline subscribers could select one of Ronan's LD plans which are:

- \$0.12/minute with no monthly fee
- \$0.07/minutes with a \$7.77/mo. fee

"Stay Connected"



The goal of Lifeline is that Local Service should cost no more or less than \$1.00 per month for local service.

The consumers who qualify for the program will be responsible for the 911 and HIT (hearing impaired tax), and federal and state tax charges.

Important Information:

- Regulations state that subscribers may not have multiple lifeline program accounts. Only **one** allowed per subscriber.
- Individual making the certification must be the subscriber in whose name the service is being provided.
- You must notify Access Montana if you are removed from your qualifying program.



Lifeline Application

Complete and return application, along with the required documentation to qualify for these discounts.

Lifeline is a government benefit program and consumers who willfully make false statements in order to obtain the benefit can be punished by fine or imprisonment or barred from the program. I certify that I receive benefits from one or more of the programs listed below. I also agree to notify Access Montana within 30 days if I cease to participate in the programs listed. I understand that by participating in Lifeline I am required to annually recertify my eligibility.

I receive benefits under one (or more) of the following programs:

NOTE: Please be prepared to show a copy of supporting documentation. Access Montana must have proof of eligibility in order to provide these benefits.

- ☐ Bureau of Indian Affairs General Assistance Program
- ☐ Tribally administered Temporary Assistance for Needy Families (TANF)
- ☐ Food Distribution Program on Indian Reservations (FDIPIR)
- ☐ Head Start (only those meeting its income qualifying standard)
- ☐ The National School Lunch Program's free lunch program
- ☐ Medicaid
- ☐ Supplemental Nutrition Assistance Program - SNAP (formerly Food Stamps)
- ☐ Supplemental Security Income (SSI)
- ☐ Federal Public Housing Assistance (Section 8)
- ☐ Low-Income Home Energy Assistance Program (LIEAP)
- ☐ Income that is at or below 135% of the Federal Poverty Guidelines (income guidelines on back of page)

PLEASE PRINT

Name:

Last First Initial
Physical Addr: Temporary Addr:

Mailing Addr: Last 4 Digits SSN# or Tribal ID #
DOB: (If current customer) CID # or Phone #

I certify under penalty of perjury that:

- I receive benefits from at least one of the programs listed above and live on the Flathead Indian Reservation, Montana;
- I agree to notify Access Montana if I cease to participate in the program or programs;
- I understand that only one Lifeline service offering is available per economic unit;
- I understand that Lifeline service is only available for one primary residential line.
- I currently do not receive Lifeline Asst. from another provider.

Signature Date

All information is **CONFIDENTIAL** with Lifeline service.

Employee: I saw supporting documentation Initial

Access Montana 63540 Hwy 93, Ronan
406-676-3300

Lifeline Assistance Program

Access Montana participates in the Universal Service Fund program which offers reduced rates to low-income subscribers for basic telephone service. The low income assistance offers two programs.

The **LinkUp America** offsets 1/2 of the initial installation fee to a qualifying applicant.

The **Lifeline Assistance Program** provides a discount to low-income subscribers on the monthly basic service charge for dial tone. Access Montana's local service receive even further discounts because our service area lies within the confines of the Flathead Indian Reservation.

No one should be without a dial tone.

Income Based Eligibility

Size of Family Unit	135% of Federal Poverty Guidelines for 2013
1	\$15,512
2	\$20,939
3	\$26,366
4	\$31,793
5	\$37,220
6	\$42,647
7	\$48,074
8	\$53,501
For each additional person, add	\$5,427

The Poverty Guidelines change each year.
They are issued in February, in the *Federal Register*, by the Department of Health and Human Services (HHS).

Acceptable forms of income based documentation include:

- Prior years state, federal , or tribal tax return
- Current income statement from an employer or paycheck stub
- Social Security statement of benefits
- Veterans Administration statement of benefits
- Retirement/pension statement of benefits
- Unemployment/Workmen's Compensation statement of benefits
- Federal or Tribal notice letter of participation in General Assistance
- A divorce decree, child support, or other official document

Access Montana

63540 Hwy 93
Ronan, Mt 59864
406-676-3300

Revised 2-21-13 bc

Stay Connected
Stay Connected
Stay Connected



Lifeline Assistance Program



RONAN TELEPHONE COMPANY AND SUBSIDIARY

SCHEDULE 1 — CONSOLIDATING BALANCE SHEET

December 31, 2017

	Ronan Telephone Company	Montana West, L.L.C.	Eliminating Entries	Total
ASSETS				
CURRENT ASSETS				
Cash and cash equivalents				
Marketable securities				
Accounts receivable				
Carrier receivables, net				
Other receivables				
Materials and supplies				
Prepayments				
Total current assets				
NONCURRENT ASSETS				
Investment in affiliates and other				
Cash surrender value of life insurance policies				
Total noncurrent assets				
PROPERTY, PLANT AND EQUIPMENT				
Telecommunications plant in service				
Land and improvements				
Furniture and office equipment				
Telephone plant and equipment				
Computers and software				
Vehicles and other work equipment				
Less accumulated depreciation				
Net property, plant and equipment				
Construction in progress				
Total assets				

RONAN TELEPHONE COMPANY AND SUBSIDIARY
SCHEDULE 1 — CONSOLIDATING BALANCE SHEET (CONTINUED)
December 31, 2017

	Ronan Telephone Company	Montana West, L.L.C.	Eliminating Entries	Total
LIABILITIES AND STOCKHOLDER EQUITY				
CURRENT LIABILITIES				
Cash Overdraft				
Accounts payable				
Accrued expenses				
Other payable				
Allowance for taxes				
Deferred income				
Other accrued taxes				
Property taxes				
Payroll advances and profit sharing				
Current portion of long-term debt				
Total current liabilities				
LONG-TERM DEBT, NET OF CURRENT PORTION				
OTHER LIABILITIES				
Customer deposits				
Deferred income taxes				
Total other liabilities				
DEFERRED REVENUE - BTOP				
Total liabilities				
STOCKHOLDER EQUITY (DEFICIT)				
Member equity (deficit)				
Common stock, no par value				
Issued and outstanding				
Retained earnings				
Accumulated other comprehensive income				
Total stockholder equity				
Total liabilities and stockholder equity				

RONAN TELEPHONE COMPANY AND SUBSDIARY
SCHEDULE 2 - CONSOLIDATING STATEMENT OF INCOME
Year Ended December 31, 2017

	Ronan Telephone Company	Montana West, L.L.C.	Eliminating Entries	Total
OPERATING REVENUE				
Basic local services				
Broadband and video				
Network access				
Long distance				
Contract and other				
Miscellaneous				
Total operating revenue				
OPERATING EXPENSES				
Network support				
General support				
Switching				
Transmission				
Cable and wire facilities				
Network operations				
Marketing				
Services				
Executive				
Contract and other				
General and administrative				
Depreciation				
Total operating expenses				
Operating income (loss)				
OTHER INCOME (EXPENSE)				
Investment income				
Interest expense				
Inventory Valuation Adjustment				
Net other income (expense)				
Income (loss) before income taxes				
Provision for income taxes				
Net income (loss)				
OTHER COMPREHENSIVE INCOME				
Unrealized gain on investments				
Income tax expense related to other comprehensive income				
Reclassification adjustment for net realized gain				
Other comprehensive income, net				
Comprehensive income (loss)				